

Broadband over power lines (BPL) offers a cost effective means for carrying information over the existing power grids. However, in spite of the many benefits proposed, BPL has the potential to severely disrupt many of the already existing licensed radio services. Because of this fact, the Commission has a high duty of regulatory and enforcement responsibility to preserve and protect the public safety, interest, convenience, and property. To this end, regulation and enforcement are critical. However, where it is proposed that BPL would come under Part 15, low power, unlicensed, transmitting devices, one cannot help but feel that the Commission would have a laze faire attitude both towards the regulation and enforcement within this specific service. Not to forget the 800/900mhz band plan and attendant interference we continue to live with.

The implementation of this technology should neither be thwarted nor be hastily adopted in the short term, but rather carefully studied and developed over a period of time in order to better understand the pervasiveness of the effects of power line radiation, reception, and to determine the best implementation plan that would not adversely effect other public service, commercial, or amateur services.

The power companies certainly don't have the best track record for locating and mitigating their own power line noise. For this reason among others, we need to approach the adoption of this technology not only cautiously, but also methodically. I can for see BPL further exacerbating their already noisy power grid system.

Regulation and enforcement is as important today as it was when the Communications Act of 1934 was written. However, the commission cannot effectively perform these functions due to the ongoing and chronic under funding. Congress needs to address this - again.